

James P. Muenker
State Bar No. 24002659
John D. Gaither
State Bar No. 24055516
NELIGAN LLP
325 N. St. Paul, Suite 3600
Dallas, Texas 75201
Telephone: (214) 840-5300
Facsimile: (214) 840-5301

**ATTORNEYS FOR ACCOUNTABLE
HEALTHCARE STAFFING, INC.
AND MICHAEL BRANDLEY**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE: § **CHAPTER 11**

SENIOR CARE CENTERS, LLC, et al. § **CASE NO. 18-33967-bjh-11**
§ **(Jointly Administered)**
DEBTORS. §

JOINT NOTICE OF APPEAL

Pursuant to 18 U.S.C. § 158(a) and Federal Rules of Bankruptcy Procedure 8002 and 8003, creditors and parties-in-interest Accountable Healthcare Staffing, Inc. and Michael Brandley (collectively, the “Appellants”) jointly give notice of their appeal of the Court’s December 13, 2019 *Findings of Fact, Conclusions of Law, and Order Confirming Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* (the “Confirmation Order”) [Docket No. 2376], a copy of which is attached hereto as **Exhibit A**.

Part 1: Identify the Appellants

1. Names of Appellants: Accountable Healthcare Staffing, Inc. and Michael Brandley

2. Position of Appellants in bankruptcy case that is the subject of this appeal:

For appeals in an adversary Proceeding.

Plaintiff

Defendant

Other (describe)

For appeals in a bankruptcy case and not in an adversary proceeding

Debtor

Creditor(s)

Trustee

Other (describe)

Part 2: Identify the subject of this appeal

1. Describe the judgment, order, or decree appealed from:

Findings of Fact, Conclusions of Law, and Order Confirming Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code (the “Confirmation Order”) [Docket No. 2376]

2. State the date on which the judgment, order, or decree was entered:

December 13, 2019

Part 3: Identify the other parties to the appeal

List the names of all parties to the judgment, order, or decree appeal from and the names, addresses, and telephone numbers of their attorneys:

Party

Attorneys

Appellants:

Accountable Healthcare Staffing, Inc.

James P. Muenker
State Bar No. 24002659
John D. Gaither
State Bar No. 24055516
NELIGAN LLP
325 N. St. Paul, Suite 3600
Dallas, Texas 75201
Telephone: (214) 840-5300
Facsimile: (214) 840-5301
jmuenker@neliganlaw.com
jgaither@neliganlaw.com

Michael Brandley

James P. Muenker
State Bar No. 24002659
John D. Gaither 24055516
NELIGAN LLP
325 N. St. Paul, Suite 3600
Dallas, Texas 75201
Telephone: (214) 840-5300
Facsimile: (214) 840-5301
jmuenker@neliganlaw.com
jgaither@neliganlaw.com

Appellees:

Senior Care Centers, LLC
Senior Rehab Solutions, LLC
HHC Portland AL, LP
and each of the other debtors in the above-captioned jointly administered bankruptcy cases¹

Trey A. Monsour
State Bar No. 14277200
Polsinelli PC
2950 N. Harwood, Suite 2100
Dallas, Texas 75201
Telephone: (214) 397-0030
Facsimile: (214) 397-0033
tmonsour@polsinelli.com

-and-

Jeremy R. Johnson (Admitted *Pro Hac Vice*)
Stephen J. Astringer (Admitted *Pro Hac Vice*)
Polsinelli PC
600 3rd Avenue, 42nd Floor
New York, New York 10016
Telephone: (212) 684-0199
Facsimile: (212) 684-0197
jeremy.johnson@polsinelli.com
springer@polsinelli.com

The Official Committee of Unsecured Creditors of Senior Care Centers, LLC, *et al.*

Shari L. Heyen
Texas Bar No. 09564750
HeyenS@gtlaw.com
Greenberg Traurig, LLP
1000 Louisiana St., Suite 1700
Houston, Texas 77002
Telephone: (713) 374-3500
Facsimile: (713) 374-3505

– and –

Nancy A. Peterman
Admitted *Pro Hac Vice*
PetermanN@gtlaw.com
Greenberg Traurig, LLP
77 West Wacker Dr., Suite 3100
Chicago, Illinois 60601
Telephone: (312) 456-8400
Facsimile: (312) 456-8435

¹ Each of the debtors in the above-captioned jointly administered bankruptcy cases are parties to the appeal. The names of each of the additional debtor entities are set forth on **Exhibit B** attached hereto, which reflects an excerpt from the Court's *Order (I) Directing Joint Administration of Chapter 11 Cases, and (II) Granting Related Relief* [Docket No. 569].

Part 4: Optional election to have appeal heard by District Court (applicable only in certain districts)

Not Applicable

Part 5: Sign below

Dated: December 27, 2019

Respectfully submitted,

NELIGAN LLP

/s/ James P. Muenker

James P. Muenker
Texas State Bar No. 24002659
John D. Gaither
Texas State Bar No. 24055516
325 N. St. Paul, Suite 3600
Dallas, Texas 75201
Telephone: (214) 840-5300
Facsimile: (214) 840-5301
jmuenger@neliganlaw.com
jgaither@neliganlaw.com

**ATTORNEYS FOR ACCOUNTABLE
HEALTHCARE STAFFING, INC.
AND MICHAEL BRANDLEY**

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of December 2019 a true and correct copy of the foregoing was served on the United States trustee, the parties to the appeal, and on all parties receiving notice via the Court's ECF filing system.

/s/ James P. Muenker

James P. Muenker